

EXHIBIT

tabbies®

A

2120 - Served
 2220 - Not Served
 2320 - Served By Mail
 2420 - Served By Publication
 SUMMONS

2121 - Served
 2221 - Not Served
 2321 - Served By Mail
 2421 - Served By Publication
 ALIAS - SUMMONS

(2-81) CCG-1

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION**

ANDRE LINEAR,)
 Plaintiff,)
 v.) No. 17 L 9233
 JOSEPH CRIPPEN, Individually and as an) JURY DEMANDED
 employee and/or actual or apparent agent of)
 TANIS TRUCKING COMPANY; TANIS)
 TRUCKING COMPANY, a Michigan)
 Corporation,)
 Defendants.) PLEASE SERVE:
) Registered Agent: David W. Tanis
) Tanis Trucking Company
) 2685 Port Sheldon St.
) Jenison, MI 49428

SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer in this case, or otherwise file your appearance in the office of the clerk of this court (located in the Richard J. Daley Center, Room 801, Chicago, Illinois 60602), within 30 days after service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT, A COPY OF WHICH IS HERETO ATTACHED.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed. This summons may not be served later than 30 days after its date.

WITNESS....., 2017

195315 2017

Atty No. 30900
 Name THE DERATANY FIRM
 Attorneys for Plaintiff
 Address 221 N LaSalle Street, Suite 2200
 City Chicago, Illinois 60601
 Telephone (312) 857-7285

Clerk of Court
 Date of service....., 2017
 (to be inserted by officer on copy
 left with defendant or other person)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ANDRE LINEAR,)
Plaintiff,)
v.) NO. 2017L009233
JOSEPH CRIPPEN, Individually and) CALENDAR/ROOM H
as an employee and/or actual or apparent) TIME 00:00
agent of TANIS TRUCKING COMPANY;) PI Motor Vehicle
TANIS TRUCKING COMPANY, a)
Michigan Corporation,)
Defendants.)

2017 SEP 13
CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DIVISION
MOTION FILED

COMPLAINT AT LAW

NOW COMES the Plaintiff, ANDRE LINEAR, by and through his attorneys, THE DERATANY FIRM, and complaining of the Defendants, JOSEPH CRIPPEN, individually and as an employee and/or actual or apparent agent of TANIS TRUCKING COMPANY, and TANIS TRUCKING COMPANY, a Michigan Corporation, states as follows:

COUNT I – NEGLIGENCE
ANDRE LINEAR v. JOSEPH CRIPPEN

1. At all relevant times herein, the Plaintiff, ANDRE LINEAR, was a resident of Cook County, Illinois, residing in Schaumburg, Illinois 60194.
2. At all relevant times herein, the Defendant, JOSEPH CRIPPEN, was a resident of Ottawa County, Michigan, residing in Jenison, Michigan 49428.
3. At all relevant times herein the Defendant, TANIS TRUCKING COMPANY, a Michigan Corporation, was located at 2685 Port Sheldon Rd., Jenison, Michigan 49428.
4. On December 4, 2015, the Plaintiff, ANDRE LINEAR, operated and controlled a motor vehicle on Central Avenue near its intersection with Washington Boulevard, in Chicago, Illinois, Count of Cook, traveling in a southbound direction, in the right lane.

5. At or near the aforementioned time and place, the Defendant, JOSEPH CRIPPEN, owned, operated, managed, maintained, and/or controlled a commercial motor vehicle, as a permissive driver, servant and/or agent and/or employee of TANIS TRUCKING COMPANY, proceeding in a southbound direction on Central Avenue, near its intersection with Washington Boulevard, in the left lane.
6. At the time and place alleged above, the Plaintiff, ANDRE LINEAR, was exercising due care and caution for his own safety and for the safety of other motorists on the roadway.
7. At the time and place alleged above, the motor vehicle operated and controlled by the Defendant, JOSPEH CRIPPEN, approached and sideswiped the driver's side of the vehicle operated by the Plaintiff, ANDRE LINEAR.
8. At all times relevant herein, it was the duty of the Defendant, JOSEPH CRIPPEN, to exercise reasonable care in operation and control of his commercial motor vehicle and to exercise reasonable care to avoid colliding with the Plaintiff and any other motor vehicles on the public roadway.
9. Notwithstanding that duty, on December 4, 2015, the Defendant, JOSPEH CRIPPEN, was negligent in one or more of the following respects in that he:
 - a. Failed to apply the brakes to avoid colliding with the Plaintiff;
 - b. Failed to stop or slow his motor vehicle so as to avoid a collision with the Plaintiff's motor vehicle;
 - c. Endangered the safety of any person or property, in violation of the provisions of 625 ILCS 5/1 1-601(a);
 - d. Failed to keep a safe and proper lookout; and
 - e. Failed to keep his vehicle under safe and proper control.
10. As a direct and proximate result of one or more or all of the foregoing negligent acts and/or omissions of the Defendant, JOSEPH CRIPPEN, the Plaintiff, ANDRE LINEAR, suffered injuries of a severe and permanent nature, and has experienced and will continue

to experience great pain and suffering. Moreover, as a result of the injuries sustained, ANDRE LINEAR has incurred and becomes liable for large sums of money in endeavoring to be cured of his injuries and will continue to incur and become liable for additional expenses in the future.

WHEREFORE, the Plaintiff, ANDRE LINEAR, demands judgment in his favor and against the Defendant, JOSPEH CRIPPEN, Individually and as an employee and/or actual or apparent agent of TANIS TRUCKING COMPANY, in an amount in excess of Fifty Thousand Dollars (\$50,000), together with the costs of this lawsuit.

COUNT II - VICARIOUS LIABILITY - NEGLIGENCE
ANDRE LINEAR v. TANIS TRUCKING COMPANY

- 1-13. Plaintiff repeats, re-adopts and re-alleges Paragraphs 1 through 13 of Count I as Paragraphs 1 through 13 of Count II as if specifically alleged herein.
14. On December 4, 2015, while driving the aforementioned vehicle in the southbound direction on Central Avenue at or near its intersection with Washington Boulevard, the Defendant, JOSPEH CRIPPEN, was a permissive driver, servant and/or agent and/or employee of the Defendant, TANIS TRUCKING COMPANY.
15. On December 4, 2015, the motor vehicle operated and controlled by the Defendant, TANIS TRUCKING COMPANY, by and through its permissive driver and/or agent or employee, JOSPEH CRIPPEN, struck the driver's side of the vehicle operated and controlled by the Plaintiff, ANDRE LINEAR.
16. At all times relevant herein, it was the duty of the Defendant, TANIS TRUCKING COMPANY, by and through its permissive driver and/or agent or employee, JOSEPH CRIPPEN, to exercise reasonable care in the operation and control of his motor vehicle,

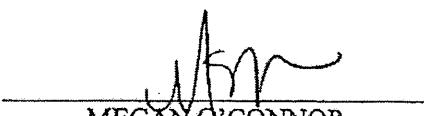
and to exercise reasonable care to avoid colliding with the Plaintiff and other motor vehicles on the public highway.

17. Notwithstanding that duty, on December 4, 2015, the Defendant, TANIS TRUCKING COMPANY, by and through its permissive driver, and/or employee or agent, JOSEPH CRIPPEN, was negligent in one or more of the following respects in that he:

- a. Failed to apply the brakes to avoid colliding with the Plaintiff;
- b. Failed to stop or slow his motor vehicle so as to avoid a collision with the Plaintiff's motor vehicle;
- c. Endangered the safety of any person or property, in violation of the provisions of 625 ILCS 5/11-601(a);
- d. Failed to keep a safe and proper lookout; and
- e. Failed to keep his vehicle under safe and proper control.

18. As a direct and proximate result of one or more or all of the foregoing negligent acts and/or omissions, of the Defendant, TANIS TRUCKING COMPANY, by and through its permissive driver, and or their agent and/or employee, JOSPEH CRIPPEN, the Plaintiff, ANDRE LINEAR, suffered injuries of a severe and permanent nature, and has experienced and will continue to experience great pain and suffering. Moreover, as a result of the injuries sustained, ANDRE LINEAR has incurred and becomes liable for large sums of money in endeavoring to be cured of his injuries and will continue to incur and become liable for additional expenses in the future.

WHEREFORE, the Plaintiff, ANDRE LINEAR, demands judgment in her favor and against the Defendant, TANIS TRUCKING COMPANY, by and through its permissive driver and/or their agent and/or employee, JOSPEH CRIPPEN, in an amount in excess of Fifty Thousand Dollars (\$50,000), together with the costs of this lawsuit.



MEGAN O'CONNOR

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ANDRE LINEAR,)
Plaintiff,)
v.) NO.
JOSEPH CRIPPEN, Individually and) JURY DEMAND
as an employee and/or actual or apparent)
agent of TANIS TRUCKING COMPANY;)
TANIS TRUCKING COMPANY, a)
Michigan Corporation,)
Defendants.)

2017 SEP 13 PM 1:52
CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
LAW DEPARTMENT
DERATANY FIRM
Megan O'Connor

AFFIDAVIT

NOW COMES your affiant, Megan O'Connor, being duly sworn under oath and deposes and states as follows:

1. I am one of the attorneys for the plaintiff in this cause.
2. The total amount of money sought exceeds Fifty Thousand Dollars.

Under penalties of perjury pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies as aforesaid that the statements contained in this instrument are true and correct except as to such statements made on information and belief and as to such statements the undersigned certifies as aforesaid that she verily believes the same to be true.


MEGAN O'CONNOR

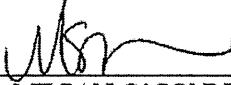
THE DERATANY FIRM
Attorneys for Plaintiff
221 North LaSalle Street
Suite 2200
Chicago, IL 60601
(312) 857-7285
Attorney No. 30900

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ANDRE LINEAR,)
Plaintiff,) NO. 2017L009233
v.) CALENDAR/ROOM H
JOSEPH CRIPPEN, Individually and) TIME 00:00
as an employee and/or actual or apparent) PI Photos Vehicle
agent of TANIS TRUCKING COMPANY;)
TANIS TRUCKING COMPANY, a)
Michigan Corporation,)
Defendants.)
JURY DEMAND

JURY DEMAND

NOW COMES the Plaintiff, by and through his attorneys, THE DERATANY FIRM, and
hereby demands a trial by jury.



MEGAN O'CONNOR

THE DERATANY FIRM
Attorneys for Plaintiff
221 North LaSalle Street
Suite 2200
Chicago, IL 60601
(312) 857-7285
Attorney No. 30900